United States Department of the Interior

FISH AND WILDLIFE SERVICE
Fairbanks Fish and Wildlife Field Office
101 12th Avenue, Room 110
Fairbanks, Alaska 99701
January 13, 2006

Surface Transportation Board
Case Control Unit
Attn: David Navecky
Environmental Filing
1925 K Street, NW
Washington, D.C. 20423-0001

Re: STB Finance Docket No. 34658
Draft Scope of Study for EIS

Dear Mr. Navecky:

The U.S. Fish and Wildlife Service has reviewed the referenced draft Scope of Study for the Alaska Railroad Corporation's (ARRC) Northern Rail Extension Project. ARRC proposes to construct and operate a new rail line between Eielson Air Force Base and the Delta Junction/Fort Greely area. The project would include about 80 miles of new mainline track, and could include a rail spur (about 15 miles) to the U.S. Air Force's Blair Lakes training area. The Service has provided verbal comments concerning this project at previous meetings. We appreciate this opportunity to summarize our comments as they relate to the draft Scope of Study and the potential environmental effects of the project.

Reasonable and Feasible Alternatives – Proposed Alignments: The Service encourages the development and selection of an alternative that both meets the objectives of the project and minimizes impacts to fish and wildlife resources, particularly the loss of wetlands and other important habitats. Currently, the Service has been working with landowners along Piledriver and Twentythree-Mile Sloughs west of Eielson Air Force Base to improve fish habitat. All three of the proposed alignments pass through at least a portion of this area. Since alignment N3 crosses the Richardson Highway between Miles 10-11 and then back between Miles 22-23, the Service would like to have considered an additional alignment (say N3a) that crosses the highway near Mile 0 instead of between Miles 10-11. This additional alignment could then either pass through Eielson Air Fore Base using the existing alignment, or pass immediately west of the airfield between the airfield and the highway before reconnecting to the N3 alignment between Miles 10-11. This alignment would bypass Piledriver and Twentythree-Mile Sloughs altogether.

Land Use: The aerial photos provided in the *Preliminary Alignments Map Set* (Rev. 2) are very helpful for project planning. The Service recommends that aerial photos also be included for the Blair Lakes Spur (Maps 6-7).

Biological Resources: The Service has little biological information upon which to base a rational evaluation for much of the proposed alignments. We therefore recommend that:

- Raptor nests be surveyed within a quarter-mile of the proposed alignments for at least two nesting seasons.

- Plant communities be delineated and classified within a quarter-mile of each proposed alignment. The Service recognizes that certain plant communities have higher habitat value than others, so the classification should include at least the following higher-value habitats: freshwater fens, riparian corridors, tall (≥ 5 ft) shrub habitats, open-water wetlands with emergent/submergent vegetation, Interior Alaska mixed forested wetlands, non-riparian low to medium (< 5 ft) shrub, open-water oxbows and sloughs, and wet meadows.

- Wetlands be delineated and classified within a quarter-mile of each proposed alignment. Portions of the alignments have previously been mapped by the National Wetlands Inventory (http://wetlands.fws.gov/). We recommend that the unmapped areas be delineated and classified using NWI standards.

- The biological impacts from other project-related activities in addition to the rail line alignments are considered, such as material and disposal sites, and work camps.

The Service also recommends a timing window for land-clearing, excavation and fill to prevent the destruction of migratory bird nests, eggs or nestlings during the spring and summer breeding season. The Migratory Bird Treaty Act prohibits the willful killing or harassment of migratory birds, so we recommend that clearing, excavation and fill activities be completed prior to May 1 or after July 15 in Interior Alaska to avoid impacts to breeding migratory birds. If this is not possible, then other measures to avoid impacts to breeding migratory birds should be initiated.

Water Resources: Construction through wetlands, streams, and rivers should be designed to minimize the short-term (e.g., temporary construction activities) and the long-term (e.g., railbed) footprint. Alignments through high-value wetlands should be minimized. Bridges should be used where practicable across the full width of the floodplain, rather than restricting the floodplain with culverts and embankments, which tend to promote channel incision from increased flow velocity and channel narrowing by accretion. Small drainage patterns should be maintained and their flow allowed to pass freely without impounding water or directing the flow through a few, larger culverts. Both impounding water behind structures and diverting the natural flow can adversely impact wetland and riparian plant communities.

Cumulative Impacts: The cumulative impacts should evaluate the potential impacts of other projects that may become feasible with the completion of the rail extension, such as increased development of the Tanana Flats resulting from improved access provided by the new rail line.

We look forward to working with the ARRC and the Surface Transportation Board on the Draft Environmental Impact Statement (EIS) for this project, and we appreciate this opportunity for early comment. Please contact Bob Henszey at 907-456-0323 should you have any questions concerning these comments.

Sincerely,

Larry K. Bright
Branch Chief, Project Planning

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cc: Christy Everett, USACE, Fairbanks
Bernardo Hernandez, Director of Community Planning, Fairbanks NSB
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